

RICHARD W. EPSTEIN (FLA. BAR NO: 229091)

(Pro Hac Vice Admission Pending)

Richard.Epstein@gmlaw.com

REBECCA F. BRATTER (FLA. BAR NO: 0685100)

(Pro Hac Vice Admission Pending)

Rebecca.Bratter@gmlaw.com

GREENSPOON MARDER, P.A.

Trade Centre South, Suite 700

100 W. Cypress Creek Road, Suite 700

Ft. Lauderdale, FL 33309

954-491-1120

954-343-6958(facsimile)

ROBERT S. BOULTER (SBN 153549)

rsb@lb-attorneys.com

PETER C. LAGARIAS (SBN 77091)

rsb@lb-attorneys.com

LAGARIAS & BOULTER, LLP

1629 Fifth Avenue

San Rafael, California 94901-1828

Telephone: (415) 460-0100

Facsimile: (415) 460-1099

Attorneys for Defendants

Global Client Solutions, LLC and

Rocky Mountain Bank and Trust

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

HEATHER NEWTON, individually and)
behalf of others similarly situated,

PLAINTIFF,

v.

AMERICAN DEBT SERVICES, INC., a)
California corporation; QUALITY
SUPPORT SERVICES, LLC, a
California limited liability company;
GLOBAL CLIENT SOLUTIONS, LLC;
ROCKY MOUNTAIN BANK AND
TRUST; and DOES 1-100,

Defendants.

) Case No: 3:11-cv-03228-EMC

) CLASS ACTION

) **PROPOSED ORDER ON GLOBAL**
) **CLIENT SOLUTIONS, LLC,**
) **ROCKY MOUNTAIN BANK AND**
) **TRUST, AND PLAINTIFF'S**
) **STIPULATION RE: DEADLINE TO**
) **RESPOND TO FIRST AMENDED**
) **COMPLAINT [D.E. 11].**

1 THIS CAUSE having come before the Court on Plaintiff Heather Newton
2 (“Plaintiff”) and Defendants Rocky Mountain Bank & Trust and Global Client
3 Solutions, LLC (collectively, “Defendants”) (all, “Parties”) Stipulation pertaining
4 to Defendants’ deadline to respond to Plaintiff’s First Amended Class Action
5 Complaint [D.E. 11], it is now thereupon,

6 PURSUANT TO STIPULATION, IT IS SO ORDERED:

7 1. The Parties’ Stipulation is GRANTED.

8 2. Defendants’ response to Plaintiff’s First Amended Class Action
9 Complaint shall be filed on or before **May 17, 2012**.

10 DONE AND ORDERED in Chambers, at San Francisco, California, on this
11 20th day of April, 2012.

